

Weber Declaration

Exhibit 26

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

HACHETTE BOOK GROUP, INC.,
HARPERCOLLINS PUBLISHERS LLC,
JOHN WILEY & SONS, INC., and
PENGUIN RANDOM HOUSE LLC,

Plaintiffs,

vs.

Case No.

1:20-cv-04160-JGK

INTERNET ARCHIVE and DOES 1
through 5, inclusive,

Defendants.

VIDEOTAPED RULE 30(B)(1) AND RULE 30(B)(6)
DEPOSITION OF HACHETTE BOOK GROUP
CORPORATE DESIGNEE: SKIP DYE
Remote Zoom Proceedings
Thursday, November 18, 2021

Job No. 4867650

Reported By: Lynne Ledanois, CSR 6811

Pages 1 - 390

1 for a number of reasons." 12:25PM
2 And we've talked about two 12:25PM
3 of those reasons, their view of 12:25PM
4 ownership and their relationship with 12:25PM
5 the Internet Archive. 12:25PM
6 Were there any others? 12:25PM
7 A The SimplyE app was an app 12:25PM
8 that was created by the New York 12:25PM
9 Public Library and some other 12:25PM
10 libraries I referred to. 12:25PM
11 It was having problems 12:25PM
12 crashing. Some of our other 12:25PM
13 aggregators, Baker & Taylor for one, 12:26PM
14 was also using the SimplyE app along 12:26PM
15 with some other apps that they had 12:26PM
16 well. 12:26PM
17 And so it was constantly 12:26PM
18 having -- it being down. 12:26PM
19 Q Okay. Any other reasons? 12:26PM
20 A Not that I recall. 12:26PM
21 Q Okay. One last question 12:26PM
22 about this. 12:26PM
23 If you go to the second page 12:26PM
24 of this thread, at the very top, the 12:26PM
25 sentence that says, in an email you 12:26PM

1 wrote, "The Internet Archive is trying 12:26PM
2 to use an as yet unproven legal 12:26PM
3 argument called 'controlled digital 12:26PM
4 lending' as legal cover for the Open 12:26PM
5 Library."
6 Do you see that? 12:26PM
7 A Yes. 12:26PM
8 Q Do you remember what you 12:26PM
9 meant by that sentence? 12:26PM
10 A That -- yes, that they 12:26PM
11 were -- Internet Archive was believing 12:27PM
12 and supporting the whole idea of 12:27PM
13 controlled digital lending. And they 12:27PM
14 believed that the open -- that they -- 12:27PM
15 was supporting some of the people 12:27PM
16 on -- it's a sort of internal 12:27PM
17 controversy at DPL itself was that. 12:27PM
18 So that's what that was about. 12:27PM
19 Q What is your understanding 12:27PM
20 of "controlled digital lending" as 12:27PM
21 you've used the term in your email 12:27PM
22 here? 12:27PM
23 A Controlled digital lending 12:27PM
24 is if an institution or a library has 12:27PM
25 a physical copy of a title that they 12:27PM

1 can scan and put that book aside, 12:27PM
2 physical book aside and do a 12:27PM
3 one-for-one lend of the digital scan 12:27PM
4 that they made of that book. 12:27PM

5 Q And by "one-for-one lend," 12:27PM
6 what do you mean? 12:28PM

7 A That it is one book, one 12:28PM
8 user. So if they have scanned that 12:28PM
9 book, that physical book, they cannot 12:28PM
10 lend out that physical book if they've 12:28PM
11 also lent out the scanned version of 12:28PM
12 that book, both of which is not -- if 12:28PM
13 it is under copyright is illegal to 12:28PM
14 do. 12:28PM

15 Q Why do you think that is 12:28PM
16 illegal to do? 12:28PM

17 A Because an e-Book is not the 12:28PM
18 same thing as a hardcover book. An 12:28PM
19 e-Book is lendable umpteen multiple of 12:28PM
20 times. 12:28PM

21 They are not equal, they are 12:28PM
22 not the same. An e-Book can be -- one 12:28PM
23 file could satisfy the needs of the 12:28PM
24 world. 12:28PM

25 Q What do you mean by "satisfy" 12:28PM

1 the needs of the world"? 12:28PM

2 A That one e-Book file could 12:28PM

3 be checked out a multitude of times. 12:29PM

4 You don't need to basically 12:29PM

5 distribute -- like a physical book 12:29PM

6 you'd have to distribute multiple 12:29PM

7 copies of. 12:29PM

8 For an e-Book, you can just, 12:29PM

9 with very little to no cost, make a 12:29PM

10 copy and distribute that e-Book. 12:29PM

11 Q Okay. I want to switch 12:29PM

12 gears a little bit here. I wanted to 12:29PM

13 ask you about the type of market 12:29PM

14 research and analysis that PRH does. 12:29PM

15 And my first question in 12:29PM

16 this line is: Has PRH studied or 12:29PM

17 analyzed how long after publication of 12:29PM

18 a title peak sales of that title 12:29PM

19 typically occur? 12:29PM

20 MS. STEINMAN: Objection. I 12:29PM

21 would also note that is not a 12:29PM

22 30(b)(6) topic of Mr. Dye. He can 12:29PM

23 answer if he knows within his 12:29PM

24 personal knowledge. 12:29PM

25 MS. LANIER: He's designated 12:29PM

1 for Topic 17 and that's literally 12:29PM
2 in Topic 17. 12:30PM
3 Q Go ahead, Mr. Dye. 12:30PM
4 A I know that many groups in 12:30PM
5 our -- look at the life span of a 12:30PM
6 title and there's sales up and down. 12:30PM
7 So I am aware of a variety 12:30PM
8 of stuff as people look at to acquire 12:30PM
9 new books by the same author, look to 12:30PM
10 see different subject matters. 12:30PM
11 Q Okay. When is the -- when 12:30PM
12 is the typical peak of sales relative 12:30PM
13 to when a title is published? 12:30PM
14 MS. STEINMAN: Could we 12:30PM
15 pause for a second? Off the 12:30PM
16 record. 12:30PM
17 I do not believe this is one 12:30PM
18 of his topics. So give me a 12:30PM
19 second, please. 12:30PM
20 MS. LANIER: Should we go 12:30PM
21 off the record? 12:30PM
22 MS. STEINMAN: Yes. 12:30PM
23 MS. LANIER: Let's go off 12:30PM
24 the record, John. Thank you. 12:30PM
25 VIDEOGRAPHER: We're off the 12:30PM

1	record. It's 12:30 p.m.	12:30PM
2	(Recess taken.)	12:30PM
3	VIDEOGRAPHER: We're back on	12:31PM
4	the record. It's 12:31 p.m.	12:31PM
5	MS. LANIER: Ms. Steinman	12:31PM
6	has objected that this question is	12:31PM
7	outside of Topic 17 and it falls	12:32PM
8	under Topic 17G. At any rate, I	12:32PM
9	will pose the question again.	12:32PM
10	MS. STEINMAN: Yes. And	12:32PM
11	that was revised by the parties in	12:32PM
12	their agreement.	12:32PM
13	Again, you can go ahead and	12:32PM
14	question him, but this is not a	12:32PM
15	30(b) (6) topic.	12:32PM
16	MS. LANIER: Objections	12:32PM
17	noted.	12:32PM
18	Q When for a typical book does	12:32PM
19	the peak sales revenue occur relative	12:32PM
20	to when that book is published?	12:32PM
21	A I can't speculate for that.	12:32PM
22	All children are different, as I say.	12:32PM
23	Q Okay. For a nonfiction	12:32PM
24	book, when is the typical peak of	12:32PM
25	sales relative to their publication?	12:32PM

1 A Again, I cannot -- sorry, 12:32PM
2 but I cannot really address that 12:32PM
3 because every book has its own life 12:32PM
4 and its own story. 12:32PM
5 Q You mentioned that PRH and 12:33PM
6 different divisions in PRH have 12:33PM
7 studies those or analyzed when peak 12:33PM
8 sales of titles occur. 12:33PM
9 12:33PM
10 What have been the results 12:33PM
11 12:33PM
12 MS. STEINMAN: Objection. 12:33PM
13 THE WITNESS: I don't know 12:33PM
14 12:33PM
15 what has been the results of those 12:33PM
16 studies. I only know when we talk 12:33PM
17 about that, you know, books, gift 12:33PM
18 books sell a lot in the fall 12:33PM
19 season for Christmas gift giving. 12:33PM
20 12:33PM
21 But basically it's more 12:33PM
22 12:33PM
23 12:33PM
24 around things we do in sales 12:33PM
25 12:33PM
26 12:33PM
27 related to promotions and 12:33PM
28 12:33PM
29 Halloween books sell best during 12:33PM
30 12:33PM
31 12:33PM
32 Halloween. 12:33PM
33 12:33PM
34 BY MS. LANIER: 12:33PM
35 Q Okay. So it would be 12:33PM
36 12:33PM
37 variable, then, when peak sales would 12:33PM

1 occur for a title? 12:33PM

2 A It could be. 12:34PM

3 Q Has PRH studied when peak 12:34PM

4 circulation at libraries occurs for 12:34PM

5 e-Books relative to when a title is 12:34PM

6 published? 12:34PM

7 A We have tried to study that. 12:34PM

8 Again, it's hard to get conducive 12:34PM

9 information because a lot of that 12:34PM

10 information is either in an aggregate 12:34PM

11 that's not always -- it's more 12:34PM

12 directional. 12:34PM

13 Q What do you mean by "more 12:34PM

14 directional"? 12:34PM

15 A You can't get exact numbers 12:34PM

16 from stuff like you can from book 12:34PM

17 store sales that are going on that are 12:34PM

18 directly things that are sold directly 12:34PM

19 from our -- we sell direct to book 12:34PM

20 stores. We do not sell direct 12:34PM

21 necessarily to libraries. 12:34PM

22 Q Do aggregators provide PRH 12:34PM

23 with circulation information? 12:35PM

24 A They do, yes. They can. 12:35PM

25 Q Is the circulation data that 12:35PM

1 aggregators provide to PRH, does that 12:35PM
2 enable PRH to conduct this kind of 12:35PM
3 analysis? 12:35PM

4 A It's difficult because the 12:35PM
5 data is not presented easily in a way. 12:35PM
6 There is no way -- there's not a way 12:35PM
7 for me to easily pull out chunks of 12:35PM
8 information which is purposeful on 12:35PM
9 that information. 12:35PM

10 Also, it depends on if the 12:35PM
11 library refuses to share it. Again, 12:35PM
12 it's a transaction between the 12:35PM
13 aggregator. 12:35PM

14 Q When you say the data is 12:35PM
15 difficult to pull out, is that because 12:35PM
16 of the way it's formatted or is it 12:35PM
17 encrypted? I'm just not sure I'm 12:35PM
18 understanding. 12:35PM

19 A It's the way the platform is 12:35PM
20 created. It's not related to 12:35PM
21 encryption. It's just the ease of 12:35PM
22 use. 12:36PM

23 Q Got it. Based on the 12:36PM
24 analysis PRH has been able to do about 12:36PM
25 circulation data, is there a time 12:36PM

1 relative to when a title is published 12:36PM
2 where circulation peaks? 12:36PM
3 A Factors are similar to that 12:36PM
4 in the consumer world. So if it's a 12:36PM
5 movie that's coming out or if it's -- 12:36PM
6 if it is a TV show that's coming out 12:36PM
7 or if it's a new book by an author, 12:36PM
8 all of those could be factors. 12:36PM
9 The work we do is basically 12:36PM
10 trying to look at -- we've never been 12:36PM
11 able to look at it holistically. 12:36PM
12 There is no way to get a picture of 12:36PM
13 all the library activity that goes on 12:36PM
14 in the United States. 12:36PM
15 Q Okay. So if I'm 12:36PM
16 understanding your explanation 12:37PM
17 correctly, factors that would affect 12:37PM
18 circulation of a title would also 12:37PM
19 affect factors of revenue for that 12:37PM
20 title; is that accurate? 12:37PM
21 A Potentially, it can. 12:37PM
22 Q Okay. When would it not? 12:37PM
23 A When would it not? Well, 12:37PM
24 you can't conductively say based 12:37PM
25 upon -- we don't have conducive data 12:37PM

1 to really bring out that point. 12:37PM
2 Q Okay. So you mentioned 12:37PM
3 seasonal factors having an effect. 12:37PM
4 A Uh-huh. 12:37PM
5 Q You mentioned I think the 12:37PM
6 type of book might have an effect. 12:37PM
7 What other factors might 12:37PM
8 affect circulation numbers relative to 12:37PM
9 data publication or revenue relative 12:37PM
10 to data publication? 12:38PM
11 A It would be availability of 12:38PM
12 the title in open archive because we 12:38PM
13 don't necessarily see the circulation 12:38PM
14 data that library -- the library -- we 12:38PM
15 don't get that data, what is 12:38PM
16 circulated, by that particular library 12:38PM
17 if it's -- if they have that book 12:38PM
18 available from that piece. 12:38PM
19 So we do see that that has 12:38PM
20 the harm to our marketplace. 12:38PM
21 So there could be factors to 12:38PM
22 where circulation we may see is down 12:38PM
23 but that may be attributed to the 12:38PM
24 patrons are getting and circulating 12:38PM
25 and downloading that book from 12:38PM

1 Internet Archive instead of going 12:38PM
2 through their legitimate means. 12:38PM
3 Q Does PRH have any data to 12:38PM
4 suggest that fluctuations in 12:38PM
5 circulation or revenue are tied to 12:38PM
6 titles being available on the Internet 12:38PM
7 Archive? 12:38PM
8 MS. STEINMAN: Objection. 12:38PM
9 Go ahead. 12:38PM
10 THE WITNESS: It's just 12:39PM
11 common knowledge. If it's 12:39PM
12 available someplace else -- if 12:39PM
13 somebody is looking for it and 12:39PM
14 it's available someplace else for 12:39PM
15 them to check out, because it's 12:39PM
16 not available from the library, it 12:39PM
17 stands to reason that people who 12:39PM
18 are wanting to read it will 12:39PM
19 download it where they can get it. 12:39PM
20 That patron, if they can't 12:39PM
21 find it on their library's 12:39PM
22 website, will go to Internet 12:39PM
23 Archive and see it there and 12:39PM
24 download it. 12:39PM
25

1 BY MS. LANIER: 12:39PM

2 Q Do you have evidence that 12:39PM

3 that occurred? 12:39PM

4 A I would say it's common 12:39PM

5 sense that if a reader wants to read, 12:39PM

6 they're going to try to find how to 12:39PM

7 read the book. 12:39PM

8 Q Okay. So you don't have 12:39PM

9 evidence then apart from common sense? 12:39PM

10 MS. STEINMAN: Objection. 12:39PM

11 Go ahead, Skip. 12:39PM

12 THE WITNESS: I don't 12:39PM

13 have -- I don't have any evidence. 12:39PM

14 BY MS. LANIER: 12:39PM

15 Q We sort of started talking 12:39PM

16 about this a little bit, but I do want 12:39PM

17 to talk about other factors that might 12:40PM

18 affect how a title would perform both 12:40PM

19 in terms of revenue and circulation. 12:40PM

20 Might the fact that -- I'll 12:40PM

21 list some ideas. You tell me if that 12:40PM

22 might affect a title or not. 12:40PM

23 The identity of the author 12:40PM

24 and whether the author has published a 12:40PM

25 book before? 12:40PM

1	MS. STEINMAN: Objection.	12:40PM
2	Go ahead.	12:40PM
3	THE WITNESS: Can I ask you	12:40PM
4	for clarification?	12:40PM
5	MS. LANIER: Please.	12:40PM
6	THE WITNESS: I apologize.	12:40PM
7	I don't understand what you're	12:40PM
8	asking when you -- can you ask	12:40PM
9	again that question that you're	12:40PM
10	wanting answers to your variety of	12:40PM
11	situations that you're going to	12:40PM
12	relay?	12:40PM
13	I apologize, I just didn't	12:40PM
14	grasp the two in my head.	12:40PM
15	BY MS. LANIER:	12:40PM
16	Q No trouble at all. Happy to	12:40PM
17	do it. It was an inartfully worded	12:40PM
18	question, so I'll take another stab at	12:40PM
19	it.	12:40PM
20	A Okay.	12:40PM
21	Q So I'm trying to get a sense	12:40PM
22	of factors that might affect how a	12:40PM
23	title will perform commercially.	12:40PM
24	Revenue, circulation, you	12:41PM
25	mentioned earlier that sometimes the	12:41PM

1 same factors might affect each. 12:41PM

2 So I just wanted to get a 12:41PM

3 sense from you of factors based on 12:41PM

4 your experience, long experience in 12:41PM

5 publishing that might affect how a 12:41PM

6 title performs or how popular a title 12:41PM

7 is. 12:41PM

8 Can you think of examples of 12:41PM

9 factors? 12:41PM

10 MS. STEINMAN: Objection to 12:41PM

11 form. Go ahead. 12:41PM

12 THE WITNESS: I mean, I 12:41PM

13 don't know how -- I'll list -- I 12:41PM

14 have a list that's an arm long or 12:41PM

15 longer, your arm or mine or both, 12:41PM

16 of factors that played into it. 12:41PM

17 So I don't -- the other 12:41PM

18 stuff would be speculation at this 12:41PM

19 point. If I knew, then it would 12:41PM

20 be a lottery ticket that I would 12:41PM

21 need to play because then I could 12:42PM

22 have and get some stuff. 12:42PM

23 But there is a myriad of 12:42PM

24 factors, not least of -- it's the 12:42PM

25 author, the topic, publicity, 12:42PM

1 marketing, promotion. 12:42PM
2 BY MS. LANIER: 12:42PM
3 Q Okay. Would it be accurate 12:42PM
4 to say that some of the myriad of 12:42PM
5 factors to which you alluded might 12:42PM
6 affect revenue for one title but not 12:42PM
7 another? 12:42PM
8 A That, again, is it's 12:42PM
9 possible; but again, it's hard to be 12:42PM
10 specific because the -- again, 12:42PM
11 overthinking your question is that 12:42PM
12 what you're saying -- each of them are 12:42PM
13 different. If you have a title, 12:42PM
14 specific title you want to talk about, 12:42PM
15 if I know about it, I can speculate. 12:42PM
16 But that's not really what 12:42PM
17 I'm here to do. I'm -- I'll just 12:42PM
18 telling you what I know, so... 12:43PM
19 Q Do you ever -- strike that. 12:43PM
20 Let's back up. 12:43PM
21 Are you aware of any 12:43PM
22 forecasting or projection of how much 12:43PM
23 revenue a title will earn that's done 12:43PM
24 at PRH? 12:43PM
25 A I know that we do basically 12:43PM

1 P&Ls for each of our titles, yes. I 12:43PM
2 do know that. 12:43PM

3 Q At what stage in the 12:43PM
4 publication of the title does that P&L 12:43PM
5 occur? 12:43PM

6 MS. STEINMAN: Objection, 12:43PM
7 assumes -- go ahead. 12:43PM

8 THE WITNESS: This is not my 12:43PM
9 expertise. I mean, I'm not in the 12:43PM
10 acquisition piece of it. 12:43PM

11 I know that it's part of the 12:43PM
12 acquisition process. Where it 12:43PM
13 comes in that acquisition process 12:43PM
14 and the decision, that's the 12:43PM
15 decision of the publishers to 12:43PM
16 make. 12:43PM

17 So the decisions they make 12:43PM
18 are their decisions they make for 12:44PM
19 their publishing division. 12:44PM

20 BY MS. LANIER: 12:44PM

21 Q So when you say "acquisition 12:44PM
22 process," is that before PRH gets the 12:44PM
23 rights to publish a title? 12:44PM

24 A I'm talking about when they 12:44PM
25 sit down and decide if they want to 12:44PM

1 acquire a book, there is a whole 12:44PM
2 process in place that they go through. 12:44PM
3 Just as if you're wanting to 12:44PM
4 go and buy a car, there is a process 12:44PM
5 that you go through to assess what 12:44PM
6 kind of car you want to buy. 12:44PM
7 Q Got it. So what data, what 12:44PM
8 factors does PRH look at when putting 12:44PM
9 together a P&L in the acquisition 12:44PM
10 phase of the title? 12:44PM
11 MS. STEINMAN: Objection. 12:44PM
12 You can ask Mr. Dye whether he is 12:44PM
13 involved and/or he does this, but 12:44PM
14 you can't ask him what PRH does on 12:44PM
15 this topic. 12:44PM
16 This is so far beyond what 12:44PM
17 he does in his daily work and he's 12:44PM
18 not a 30(b)(6) witness on this 12:45PM
19 topic. 12:45PM
20 BY MS. LANIER: 12:45PM
21 Q Please answer the question, 12:45PM
22 Mr. Dye. 12:45PM
23 A This is not my -- I mean, 12:45PM
24 it's not my -- this is not what I do. 12:45PM
25 You know, I -- as I said 12:45PM

1 earlier, I'm involved in the 12:45PM
2 pediatrician side. The kid is already 12:45PM
3 born. I'm not in the whole creation 12:45PM
4 side. 12:45PM

5 So I really can't speak to 12:45PM
6 that. 12:45PM

7 Q Okay. What kind of analysis 12:45PM
8 does PRH do when it's considering what 12:45PM
9 licensing structures to use to convey 12:45PM
10 e-Books? 12:45PM

11 MS. STEINMAN: Objection. 12:45PM
12 Go ahead, Skip. 12:45PM

13 THE WITNESS: Again, 12:45PM
14 Ms. Lanier, I'm confused by your 12:45PM
15 question. It may be terminology 12:46PM
16 in my head. I'm sorry. 12:46PM

17 BY MS. LANIER: 12:46PM

18 Q No problem. 12:46PM
19 A So there is no -- they are 12:46PM
20 not related in my viewpoint. But -- 12:46PM
21 so that's why I'm having difficulty 12:46PM
22 answering that question because I see 12:46PM
23 them as not -- it's two different 12:46PM
24 things, two different -- I don't know 12:46PM
25 if I'm explaining myself well. 12:46PM

1	Q	What was the name of the	7:22PM
2		attorney that you made that	7:22PM
3		communication to?	7:22PM
4	A	It would be Carolyn Foley.	7:22PM
5	Q	When was that communication	7:22PM
6		made?	7:22PM
7	A	I do not know exactly.	7:22PM
8	Q	Where was it made?	7:22PM
9	A	Probably here in my house on	7:22PM
10		a video conversation with her.	7:22PM
11		MS. LANIER: Mr. Dye, I want	7:22PM
12		to thank you for giving us your	7:22PM
13		time today. I know it was a tough	7:22PM
14		day, and for reasons hopefully not	7:22PM
15		all tethered to the lawsuit.	7:22PM
16		It is not a fun experience	7:22PM
17		to be deposed, but I hope we made	7:22PM
18		it as painless as possible for	7:23PM
19		you. Thank you for your time	7:23PM
20		today, sir.	7:23PM
21		MS. STEINMAN: I'm going to	7:23PM
22		do a short redirect.	7:23PM
23		EXAMINATION	7:23PM
24		BY MS. STEINMAN:	7:23PM
25	Q	Mr. Dye, has the Internet	7:23PM

1 Archive created current harm to PRH? 7:23PM
2 A Yes. 7:23PM
3 Q What type of harm? 7:23PM
4 A They are acting as an 7:23PM
5 aggregator. They are basically taking 7:23PM
6 our content, distributing it without 7:23PM
7 paying any fees related to it. 7:23PM
8 They are also hurting our 7:23PM
9 library direct sales by instructing 7:23PM
10 libraries that it's okay to scan books 7:23PM
11 that they have, physical books that 7:23PM
12 they have on the shelves and offer 7:23PM
13 them up through controlled digital 7:23PM
14 lending. 7:23PM
15 They are also affecting us 7:23PM
16 in our consumer sales. The consumer 7:23PM
17 can go and find the book available on 7:23PM
18 Internet Archive and download it for 7:23PM
19 free without paying any cost back to 7:24PM
20 the right holder or to the publisher 7:24PM
21 and/or the author. 7:24PM
22 Q And if Internet Archive has 7:24PM
23 not paid an aggregator license fee for 7:24PM
24 all the books available for 7:24PM
25 downloading on open library, is that 7:24PM

1 evidence of harm to Penguin Random 7:24 PM
2 House? 7:24 PM
3 A Yes. You've lost that 7:24 PM
4 income. 7:24 PM
5 Q Has Internet Archive 7:24 PM
6 provided all the data to Penguin 7:24 PM
7 Random House that it would need to 7:24 PM
8 accurately calculate the harm to 7:24 PM
9 Penguin Random House from Internet 7:24 PM
10 Archive? 7:24 PM
11 A No, they have not. 7:24 PM
12 Q What data would that 7:24 PM
13 include? 7:24 PM
14 A I would need to know the 7:24 PM
15 circulation of all people at Random 7:24 PM
16 House titles that are on and available 7:24 PM
17 and have been distributed illegally by 7:24 PM
18 Internet Archive, whether they be 7:24 PM
19 through a loan or a person has 7:24 PM
20 downloaded it and kept it for that -- 7:24 PM
21 it's data that we would need for all 7:25 PM
22 ISBNs because there's multiple 7:25 PM
23 versions of the same title but 7:25 PM
24 different ISBNs. 7:25 PM
25 MS. STEINMAN: Thank you. 7:25 PM

1 I, LYNNE M. LEDANOIS, a Certified
2 Shorthand Reporter of the State of
3 California, do hereby certify:

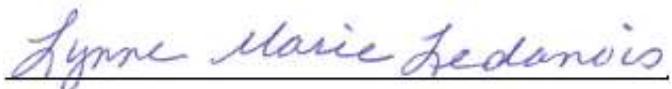
4 That the foregoing proceedings were
5 taken before me at the time and place herein
6 set forth; that a record of the proceedings
7 was made by me using machine shorthand which
8 was thereafter transcribed under my
9 direction; that the foregoing transcript is a
10 true record of the testimony given.

11 Further, that if the foregoing
12 pertains to the original transcript of a
13 deposition in a Federal Case, before
14 completion of the proceedings, review of the
15 transcript [X] was [] wasn't requested.

16 I further certify I am neither
17 financially interested in the action nor a
18 relative or employee of any attorney or party
19 to this action.

20 IN WITNESS WHEREOF, I have this
21 date subscribed my name.

22 Dated: 11/22/2021

23 
24

25 LYNNE MARIE LEDANOIS

CSR No. 6811